

EXHIBIT 2

Declaration of Loran Kelly

HOLLAND & HART LLP
 5441 Kietzke Lane, 2nd Floor
 Reno, NV 89511
 Phone: (775) 327-3000 ♦ Fax: (775) 786-6179

Robert C. Ryan (Nevada Bar No. 7164)
 Joshua M. Halen (Nevada Bar No. 13885)
 HOLLAND & HART LLP
 5441 Kietzke Lane, Second Floor
 Reno, NV 89511
 Phone: (775) 327-3000
 Fax: (775) 786-6179
 rcryan@hollandhart.com
 jmhalen@hollandhart.com

Attorneys for Defendant

THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GLOCK, INC., a Georgia Corporation,

Plaintiff,

v.

POLYMER80, INC., a Nevada Corporation,

Defendant.

CASE NO.: 3:23-cv-00086-MMD-CLB

**DECLARATION OF LORAN KELLEY IN
 SUPPORT OF POLYMER80'S REQUEST
 FOR EXTENSION OF TIME**

I, Loran Kelley, declare as follows:

1. I am over 18 years of age and am familiar with matters herein of my knowledge except as to matters stated upon information and belief and as to those matters, I believe them to be true. If called as a witness, I would be competent to testify as to the matters stated in this Declaration.

2. I am the Chief Executive Officer for Defendant Polymer80, Inc. I have served in this role since 2021. My duties as CEO include managing the daily business of Polymer80 Inc. to include overseeing sales, marketing, operations, engineering, human resources, and legal activities.

3. This Declaration is made in support of Polymer80's Request for Extension of Time.

4. Polymer80 was previously involved in litigation with Plaintiff Glock, Inc., in the case of in *Polymer80, Inc. v. Glock, Inc.*, et al., Case No. 3:20-cv-00617-MMD-CLB. That prior case resulted in a settlement and was dismissed with prejudice. *See* Case No. 3:20-cv-00617-MMD-CLB (ECF Nos. 88, 90, 91).

5. I was unaware that Glock filed second suit until March 30, 2023, when Polymer80's registered agent, Mark Gunderson, Esq., and Robert C. Ryan, Esq., previous counsel for

HOLLAND & HART LLP
5441 Kietzke Lane, 2nd Floor
Reno, NV 89511
Phone: (775) 327-3000 ♦ Fax: (775) 786-6179

1 Polymer80, received Glock's Notice of Intent to Take Default on March 29, 2023. I was provided
2 the Notice of Intent to Take Default sent by Glock.

3 6. Since receiving the Notice of Intent to Take Default, I have investigated whether and
4 when Mr. Gunderson was served with the Summons and Complaint in this suit. I have since learned
5 that Mr. Gunderson's firm was served with the Summons and Complaint on March 7, 2023. After
6 service, someone at Mr. Gunderson's law firm emailed and mailed me the Summons and
7 Complaint.

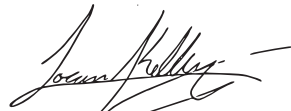
8 7. As of the filing of this Declaration, I have not received the mailed copy of the
9 Summons and Complaint from Mr. Gunderson's law firm.

10 8. While I first learned on Thursday of last week, March 30, 2023, that I did receive the
11 email containing the Summons and Complaint when it was sent to me, I receive hundreds of emails
12 a day and therefore did not earlier (that is, before March 30, 2023) notice the email when it came
13 from Mr. Gunderson's firm.. Accordingly, I only became aware of the service of the Complaint in
14 this matter after first learning, on March 30, 2023, of the Notice of Intent to Take Default sent by
15 Glock's counsel to our counsel the day before. As soon as I learned that Polymer80's registered
16 agent had been served, I commenced making arrangements for Polymer80 to retain counsel and to
17 respond to the Complaint.

18 9. To my knowledge, no other person at Polymer80 was aware that Mr. Gunderson, as
19 the registered agent, had been served with the Summons and Complaint until after Glock sent its
20 Notice of Intent to Take Default on March 29, 2023.

21 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
22 and correct.

23 Executed April 3, 2023.

24 
25 Loran Kelly
26 Carson City, Nevada
27
28